

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Case No. 19-CR-10080-NMG
)	
DAVID SIDOO, et al.,)	
)	
Defendants.)	
)	

**MOTION TO SUSPEND MOTION PRACTICE UNTIL
THE INITIAL STATUS CONFERENCE**

Defendants Gamal Abdelaziz, Diane Blake, Todd Blake, I-Hsin “Joey” Chen, Mossimo Giannulli, Elizabeth Henriquez, Manuel Henriquez, Douglas Hodge, Michelle Janavs, Elisabeth Kimmel, Lori Loughlin, William McGlashan, Jr., Marci Palatella, David Sidoo, John Wilson, Dr. Homayoun Zadeh, and Robert Zangrillo (collectively “Defendants”), through their undersigned counsel, hereby move for the court to suspend substantive motion practice and to address the issue of a briefing schedule for all substantive motions in this case at the initial status conference scheduled for June 3, 2019.

Defendants Amy and Gregory Colburn have filed a Motion to Dismiss Second Superseding Indictment (Doc. 341). In that Motion, the Colburns raise arguments that are relevant to all the defendants charged in the Second Superseding Indictment. At present, the Defendants have not yet received any discovery in this case and have been told by the government that it is extremely voluminous. Defendants would like an opportunity to review

discovery in a meaningful way before filing of substantive motions in this case. Litigating substantive motions in a piecemeal fashion and before Defendants have an opportunity to become familiar with the government's evidence could substantially prejudice the Defendants' ability to make proper legal arguments to contest the allegations.

The court has set a date for the initial status conference on June 3, 2019. The Defendants request that this court issue an Order suspending substantive motion practice (not including motion practice relating to a protective order) until the initial status conference, at which time a briefing schedule for substantive motions can be discussed with all parties present.

Counsel for the Colburns has stated that he will take no position on this motion. The government has also stated that it takes no position on this motion.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Jonathan L. Kotlier, hereby certify that on April 21, 2019, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Jonathan L. Kotlier

Jonathan L. Kotlier

RULE 7.1 CERTIFICATION

I hereby certify that on April 19, 2019, counsel for Defendants conferred with counsel for defendants Amy and Gregory Colburn and he stated he will take no position on this motion. Counsel for Defendants also conferred with counsel for the United States and he stated that it will take no position on this motion.

/s/ Jonathan L. Kotlier

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